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July 15, 2025

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Hector Gonzalez, U.S.D.J.
225 Cadman Plaza East
Courtroom 6A South
Brooklyn, NY 11201-1804

Re: Uribe v. Elahi LLC, *et ano.*
Case No.: 1:24-cv-7182 (CLP)
Letter Motion for Extension of Time

Dear Judge Gonzalez:

This office represents the Defendants in the above-referenced case. Defendants write to respectfully request an extension of time of one (1) week to submit opposition to Plaintiff's motion to compel. Consistent with ¶ 1(C)(2) of this Court's Individual Practices, Defendants respectfully submit that: (a) the original deadline falls on today's date, July 15, 2025; (b-c) there have been no previous requests for an extension of time; (d) for the reasons set forth below, Defendants were unable to ascertain whether Plaintiff consents; (e) the other dates previously scheduled consist of July 21, 2025 for the completion of fact discovery; and (f) the grounds for the requested extension are that your undersigned has been mired in preparation for a continued evidentiary hearing before the Hon. Lewis J. Liman, U.S.D.J. on an emergency Order to show cause in Legacy Restoration, LLC v. Barajas, Case No.: 1:25-cv-5319 (LJL) (OTW) continuing tomorrow at 10:00 AM.

Based on the foregoing, Defendants respectfully submit that sufficient good cause and excusable neglect exists for an extension of time to respond to the Plaintiff's motion to compel. See Fed. R. Civ. P. 6(b)(1)(B). Defendants thank this Court for its time and attention to this case.

Dated: Jamaica, New York
July 15, 2025

Respectfully submitted,
SAGE LEGAL LLC

/s/ Emanuel Kataev, Esq.

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VIA ECF

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